

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAROLYN E. JONES,)	
Plaintiff)	
)	Civil Action No. 04-10133-MEL
V.)	
)	
WILLIAM A. MASON, Chief of)	
Police, Harwich Police Department)	
and TOWN OF HARWICH,)	
Defendants,)	

PLAINTIFF'S MOTION TO ENLARGE TIME IN
WHICH TO FILE OPPOSITION TO MOTION
FOR SUMMARY JUDGMENT

Now comes the Plaintiff above named and moves to enlarge the time to file her opposition to Defendants' Motion for Summary Judgment until January 13, 2005. In support of this motion, Plaintiff shows that Defendants filed their motion electronically on November 30, 2004, the last date set in the scheduling order for the filing of dispositive motions. Defendant's brief runs 20 pages and addresses First Amendment issues, claims under 42 U.S.C. section 1983, and claims under the Massachusetts Civil Rights Act and Massachusetts laws prohibiting discrimination in employment. There has been extensive discovery in this case including approximately eight depositions. In addition, there are transcripts from a related arbitration proceeding which must be reviewed. Given the nature of the claims and the volume of discovery, preparation of an appropriate opposition will require an extensive amount of time. In addition, Plaintiff's counsel notes that the holiday season has inevitably resulted in days when their office is closed and reduced productivity. Moreover, the undersigned counsel was on trial on

December 24 and 27, 2004 in the Norfolk County Probate Court, Nicholas v. Nicholas, No. 02D0178.

Plaintiff's counsel further notes that the scheduling order does not establish a date for responding to motions for summary judgment. Wherefore, Plaintiff moves that the date to respond be enlarged to January 13, 2005.

Respectfully submitted
By Plaintiff's Attorney,

/S/ Brian Rogal
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CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing document upon each other attorney of record by mailing first class postage pre-paid.

Date: December 29, 2004

/S/ Brian Rogal